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U.S. BANKRUPTCY COURT
DISTRICT OF NEVADA

1 Sheila Stuppy – **Debtor Pro Se**
2 P.O. Box 750725
3 Las Vegas, NV 89136
4 (702) 493-2983 - Phone

5
6 **UNITED STATES BANKRUPTCY COURT**
7 **DISTRICT OF NEVADA**

8 **In Re:**)
9 Sheila Stuppy) **CASE NO :** 13-10675-BK-S-lbr
10) **CHAPTER :** 7
11 **Debtor(s) Pro Se**) **HEARING DATE:** 04/24/2013
12) **HEARING TIME:** 10:30 AM

13 **DEBTORS OBJECTION TO**
14 **U.S. BANK NATIONAL ASSOCIATION,**
15 **AS TRUSTEE FOR GREENPOINT MORTGAGE FUNDING TRUST**
16 **MORTGAGE PASS-THROUGH CERTIFICATES,**
17 **SERIES 2006-AR4,**
18 **its assignees and/or successors,**
19 **by and through its servicing agent Ocwen Loan Servicing, LLC**
20 **MOTION FOR RELIEF FROM THE STAY**

21 I, Sheila Stuppy, the Pro Se debtor in the above entitled Chapter 7 case, oppose and
22 request that the petitioners request for Relief From the Stay **be Denied or Continued**
23 in reference to the property commonly known as 2534 Rocky Countryside Street, North Las
24 Vegas, NV 89030 for the following reasons:

- 25 1. After speaking to my Chapter 7 Trustee as well as others who attended my 341 Meeting
26 on 04/19/2013 I have a reasonable expectation that converting my Chapter 7 case to a Chapter
27 11 Case would be in the best interest of all parties involved, which include, me the debtor, the
28 estate, and my creditors.
- 29 2. I have filed a DEBTORS MOTION TO CONVERT CHAPTER 7 TO A CHAPTER 11
30 UNDER 11 U.S.C. §§ 706(a) with this court.

3. I the Debtor, Sheila K Stuppy, have a substantial change of financial circumstances which includes my additional employment and application for mortgage modification. As well as other relief available through the Chapter 11 process pursuant to 11 U.S.C. § 1325(a)(5)(B).

4. There is a reasonable likelihood that my financial condition will be rehabilitated through a plan of reorganization in Chapter 11.

5. The lender and secured creditor will receive payments through Chapter 11 process.

Legal Points and Authorities

11 U.S.C. § 706(a) The debtor may convert a case under this chapter to a case under chapter 11, 12, or 13 of this title at any time, if the case has not been converted under section 1112, 1208, or 1307 of this title. Any waiver of the right to convert a case under this subsection is unenforceable.

11 U.S.C. § 1325(a)(5)(B) Except as provided in subsection (b), the court shall confirm a plan if—

(5) with respect to each allowed secured claim provided for by the plan

(B) (i) the plan provides that

(I) the holder of such claim retain the lien securing such claim until the earlier of

(aa) the payment of the underlying debt determined under nonbankruptcy law; or

(bb) discharge under section 1328 and

(II) if the case under this chapter is dismissed or converted without completion of the plan, such lien shall also be retained by such holder to the extent recognized by applicable nonbankruptcy law;

(ii) the value, as of the effective date of the plan, of property to be distributed under the plan on account of such claim is not less than the allowed amount of such claim; and

(iii) if

(I) property to be distributed pursuant to this subsection is in the form of periodic payments, such payments shall be in equal monthly amounts; and

(II) the holder of the claim is secured by personal property, the amount of such payments shall not be less than an amount sufficient to provide to the holder of such claim adequate protection during the period of the plan; or

(C) the debtor surrenders the property securing such claim to such holder

THEREFORE, I pray that the court **denies or continues** U.S. Bank National Association, as Trustee for Greenpoint Mortgage Funding Trust Mortgage Pass-Through Certificates, Series 2006-AR4, its assignees and/or successors, by and through its servicing agent Ocwen Loan Servicing, LLC. Motion for Relief From The Stay.

1 SUBMITTED this 23rd day of April, 2013 by Sheila Stuppy the Debtor, Pro Se.

2 Sheila Stuppy

3 [REDACTED] - Debtor Pro Se

4 P.O. Box 750725

5 Las Vegas, NV 89136

6 (702) 493-2983 - Phone

7 **COPIES SENT TO:**

8 Attorney Kristin A. Schuler-Hintz

9 Attorney Sherry A. Moore,

10 McCarthy & Holthus, LLP

11 9510 West Sahara Avenue, Suite 110

12 Las Vegas, NV 89117

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(866) 339-5691 - FAX

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13 **Attorney for Secured Creditor,**

14 U.S. Bank National Association,

15 as Trustee for Greenpoint Mortgage Funding Trust

16 Mortgage Pass-Through Certificates,

17 Series 2006-AR4,

its assignees and/or successors,

by and through its servicing agent Ocwen Loan Servicing, LLC

18 **CHAPTER 7 TRUSTEE**

19 **David A. Rosenberg**

20 5030 Paradise Road, Suite B215

21 Las Vegas, NV 89119

(702) 405-7312 - Phone

(702) 947-2244 - FAX

22 Email: darosenberg@7trustee.net

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13 **CERTIFICATE OF SERVICE**

14 On April 23rd, 2012, I served a copy of the following document
15 **DEBTORS OBJECTION TO**
16 **U.S. BANK NATIONAL ASSOCIATION,**
17 **AS TRUSTEE FOR GREENPOINT MORTGAGE FUNDING TRUST**
18 **MORTGAGE PASS-THROUGH CERTIFICATES,**
19 **SERIES 2006-AR4,**
20 its assignees and/or successors,
21 by and through its servicing agent Ocwen Loan Servicing, LLC
22 **MOTION FOR RELIEF FROM THE STAY**

23 by FAX to the following people;

24 Attorney Kristin A. Schuler-Hintz
25 Attorney Sherry A. Moore,
26 McCarthy & Holthus, LLP
27 9510 West Sahara Avenue, Suite 110
28 Las Vegas, NV 89117
(702) 685-0329 - **Phone**
(866) 339-5691 – **FAX**
NVBK@McCarthyHolthus.com

Attorney for Secured Creditor,
U.S. Bank National Association,
as Trustee for Greenpoint Mortgage Funding Trust



1 Mortgage Pass-Through Certificates,
2 Series 2006-AR4,
3 its assignees and/or successors,
by and through its servicing agent Ocwen Loan Servicing, LLC

4 **CHAPTER 7 TRUSTEE**

5 **David A. Rosenberg**
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7 Las Vegas, NV 89119
8 (702) 405-7312 - **Phone**
(702) 947-2244 - **FAX**
9 **Email:** darosenberg@7trustee.net

10 **I declare under penalty of perjury that the foregoing is true and correct**

11 April 23rd 2013

12 
13 **Declarant:**  - **Debtor Pro Se**
14 P.O. Box 750725
15 Las Vegas, NV 89136
16 (702) 493-2983 - **Phone**
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